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6 *Attorney for Claimant*  
7 *Karyn Charmbury*

9  
10 **UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

11 In re  
12 PG&E CORPORATION, a California corporation,  
13 and  
14 PACIFIC GAS AND ELECTRIC COMPANY,  
INC., a California corporation  
15  
16 Debtors.

**Bankruptcy Case No. 19-30088 (DM)**

**Chapter 11**

**(Lead Case) (Jointly Administered)**

**OPPOSITION BY CLAIMANT  
KARYN CHARBURY'S COUNSEL  
TO REQUEST FOR ORDER BY  
DEFAULT AS TO UNOPPOSED  
OBJECTIONS MADE BY  
REORGANIZED DEBTORS' ONE  
HUNDRED EIGHTEENTH  
OMNIBUS OBJECTION TO CLAIMS  
(CHARMBURY CLAIMS); with  
certificate of service attached**

20 Date: November 30, 2022  
21 Time: 10:00 a.m. (Pacific Time)  
22 Place: United States Bankruptcy Court  
Courtroom 17, 16<sup>th</sup> Floor  
San Francisco, CA 94102  
(by tele/videoconference only)

23  
24 Counsel for claimant Karyn Charmbury, Donald W. Ullrich, Jr., herewith submits this  
25 opposition to request for order by default as to unopposed objections made by reorganized  
26 debtors' one hundred eighteenth omnibus objection to claims (Charmbury Claims).

27 Opposition and response to reorganized debtors' one hundred eighteenth omnibus objection to  
28 claims (Charmbury Claims) was electronically served at the following email addresses on

1 November 18, 2022, at 2:33 p.m.:

2 [PGClaims@kbkllp.com](mailto:PGClaims@kbkllp.com)

3 [jkim@kbkllp.com](mailto:jkim@kbkllp.com)

4 [dtaylor@kbkllp.com](mailto:dtaylor@kbkllp.com)

5 [dsilveira@kbkllp.com](mailto:dsilveira@kbkllp.com)

6 The documents served were:

7 (1) NOTICE OF CHANGE OF ADDRESS, TELEPHONE NUMBER, AND FACSIMILE  
8 NUMBER OF CLAIMANT KARYN CHARMBURY'S COUNSEL; with certificate of service  
9 attached

10 (2) MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF CLAIMANT  
11 KARYN CHARMBURY'S OPPOSITION AND RESPONSE TO REORGANIZED DEBTORS'  
12 ONE HUNDRED EIGHTEENTH OMNIBUS OBJECTION TO CLAIMS (CHARMBURY  
13 CLAIMS); with certificate of service attached

14 (3) DECLARATION OF CLAIMANT KARYN CHARMBURY'S COUNSEL IN SUPPORT  
15 OF OPPOSITION AND RESPONSE TO REORGANIZED DEBTORS' ONE HUNDRED  
16 EIGHTEENTH OMNIBUS OBJECTION TO CLAIMS (CHARMBURY CLAIMS); with  
17 certificate of service attached

18 (4) EXHIBITS A THROUGH AA TO SAID DECLARATION

19 From 1:40 p.m. to 2:20 p.m. on November 18, 2022, counsel attempted to electronically file  
20 into the above-entitled case via CM/ECF said opposition and response documents identified  
21 hereinabove but was denied permission to do so. Counsel contacted DeWanna (counsel is unsure  
22 as to the correct spelling of her first name) Chambers at 1.888.821.7606 at approximately 2:57  
23 p.m. after further attempts to electronically file, who instructed counsel to send an email to  
24 [ecf\\_training@canb.uscourts.gov](mailto:ecf_training@canb.uscourts.gov) requesting he be allowed to electronically file into this court's  
25 CM/ECF. Counsel understood that he was denied the ability to do so because of long inactivity.

1 Counsel sent such an email at 3:13 p.m. Counsel is awaiting action on his request.

2 I certify under the laws of the United States the foregoing is true and correct.

3

4 Dated: November 18, 2022

5 *Donald W. Ullrich, Jr.*  
6 DONALD W. ULLRICH, JR.  
7 Attorney for Claimant

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## **CERTIFICATE OF SERVICE**

My name is Donald W. Ullrich, Jr. My business address is 3100 Zinfandel Drive, Suite 265, City of Rancho Cordova, Sacramento County, California 95670-6391. I am over the age of 18 years and not a party to the within action.

On November 18, 2022, I served a true and correct copy of the attached document via electronic email upon the following named individuals, their respective email addresses stated. After sending said emails, thereafter I received no electronic notification of a failed or undeliverable electronic transmission:

PGEclaims@kbkllp.com

Jane Kim [jkim@kbkllp.com](mailto:jkim@kbkllp.com)

David A. Taylor [dtaylor@kbkllp.com](mailto:dtaylor@kbkllp.com)

Dara L. Silveira [dsilveira@kbkllp.com](mailto:dsilveira@kbkllp.com)

I certify under penalty of perjury under

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: November 18, 2022

Donald W. Ulrich, Jr.